

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ALISON O'DONNELL,	)	CASE NO. 1:16-CV-2480
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
vs.	)	
	)	
UNIVERSITY HOSPITALS HEALTH	)	REPORT OF PARTIES' PLANNING
SYSTEM, <i>et al.</i> ,	)	MEETING UNDER FED. R. CIV. P. 26(f)
	)	AND LR 16.3(b)
Defendants.	)	

1. Pursuant to FED. R. CIV. P. 26(f) and LR 16.3(b), a meeting was held on Friday, January 13, 2017, and was attended by:

Brian Spitz \_\_\_\_\_ counsel for plaintiff(s) Alison O'Donnell \_\_\_\_\_

David A. Campbell and

Liana R. Hollingsworth \_\_\_\_\_ counsel for defendant(s) University Hospitals Cleveland Medical

Center, misnamed as UHHS, Naveen

Uli, Sumana Narisham, Rose Gubitosi-

Klug, and William Rebello.

2. The parties:
- \_\_\_\_\_ have exchanged the pre-discovery disclosures required by FED. R. CIV. P.26(a)(1) and the Court's prior order;
- X\_\_\_\_\_ will exchange such disclosures by February 3, 2017;
3. The parties recommend the following track:
- \_\_\_\_\_ Expedited      X\_\_\_\_\_ Standard      \_\_\_\_\_ Complex

☐ Administrative ☐ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (ADR) mechanisms:

☐ Early Neutral Evaluation ☒ Mediation (*after discovery*)

☐ Arbitration ☐ Summary Jury Trial

☐ Summary Bench Trial

☐ Case not suitable for ADR

5. The parties ☐ do/ ☒ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

Plaintiff:

Plaintiff will conduct discovery on issues related to all issues raised in the complaint as well as the affirmative defenses raised in the answer. This will include interrogatories, requests for admissions, requests for documents, and depositions of Defendants and Fed.R.Civ.R 30(b)(6) witness. Based discovery from the Defendants, Plaintiffs may also need to depose additional witnesses.

Defendants:

Defendants anticipate seeking discovery on issues related to Plaintiff's causes of action which will include interrogatories, requests for admissions, requests for documents, and depositions. Based on Plaintiff's deposition testimony and witness lists, Defendants may also need to depose additional individuals.

(b) The parties (indicate one):

☐ agree that there will be no discovery of electronically-stored information;

or

\_\_\_\_\_ have agreed to a method for conducting discovery of electronically-stored information; or

\_\_\_x\_\_\_ have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District Ohio Local Rules)

(c) Non- Expert Discovery cut-off date: August 18, 2017

(d) Plaintiff's (or party with the burden of proof on an issue) expert report due date: September 8, 2017

Defendant's (or party without the burden of proof on an issue) due date: October 9, 2017

Expert Discovery cut-off date: November 10, 2017

7. Recommended dispositive motion date: September 18, 2017

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8. Recommended cut-off date for amending the pleadings and/or adding additional parties: February 10, 2017

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9. Recommended date for a Status Hearing: August 7, 2017

10. Other matters for the attention of the Court:

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Respectfully submitted,

/s/ Brian D. Spitz

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*Attorneys for Plaintiff*

/s/ Liana R. Hollingsworth

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 13th day of January, 2017, the foregoing *Report of Parties' Planning Meeting* was filed via the Court's CM/ECF system, which will send a notice of electronic filing to all registered parties. All parties can access this filing via the Court's CM/ECF system.

/s/ Liana R. Hollingsworth  
Liana R. Hollingsworth (0085185)